



**FEDERAL ELECTION COMMISSION**  
Washington, DC 20463

**MEMORANDUM**

**TO:** Office of the Commission Secretary

**FROM:** Office of General Counsel *KCS*

**DATE:** December 21, 1999

**SUBJECT:** MUR 4594- General Counsel's Report

The attached is submitted as an Agenda document for the Commission Meeting of \_\_\_\_\_

Open Session \_\_\_\_\_

Closed Session \_\_\_\_\_

**CIRCULATIONS**

**DISTRIBUTION**

**SENSITIVE**

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**NON-SENSITIVE**

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72 Hour TALLY VOTE ☐

24 Hour TALLY VOTE ☐

24 Hour NO OBJECTION ☐

INFORMATION ☐

96 hour Tally Vote ☒

**COMPLIANCE**

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Open/Closed Letters

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MUR

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DSP

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**STATUS SHEETS**

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Enforcement

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Litigation

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PFESP

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**RATING SHEETS**

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**AUDIT MATTERS**

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**LITIGATION**

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**ADVISORY OPINIONS**

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**REGULATIONS**

☐

**OTHER**

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21.04.402.5160

DEC 21 1999

BEFORE THE FEDERAL ELECTION COMMISSION

**SENSITIVE**

In the Matter of )  
 )  
Longevity International Enterprises Corporation ) MUR 4594  
China Airlines, Ltd. )

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
SECRETARIAT  
1999 DEC 21 P 4:04

GENERAL COUNSEL'S REPORT

I. **ACTIONS RECOMMENDED:** Accept the attached conciliation agreement with Longevity and close the file as to China Airlines, Ltd.

II. **BACKGROUND**

On September 14, 1999, the Commission approved a post-probable cause conciliation agreement with Longevity International Enterprises Corporation ("Longevity").

Longevity has submitted the attached agreement which this Office recommends that the Commission accept. Attachment 1.

The payment for the civil penalty has not yet been received.

21-04-402-5161

21.04.402.5162

21.04.402.5163

21.04.1403.5154

21-04-1402-5165

21-04-402-5166

Accordingly, this

Office recommends that the Commission take no further action as to CAL and close the file as to it. Nevertheless, in light of the evidence that CAL was involved in the management of Longevity and that employees that CAL had loaned to Longevity were involved in negotiating the rental agreement with Fasi, this Office intends to include an admonishment in the notification letter to CAL.

After closing the file in this matter as to Longevity and CAL, the only remaining respondent will be Fasi (against whom the Commission has authorized civil suit).

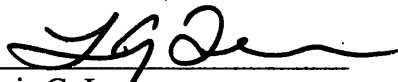
#### IV. RECOMMENDATIONS

1. Accept the attached agreement with Longevity International Enterprises Corporation, and close the file as to it.
2. Take no further action as to China Airlines, Ltd., approve an admonishment letter and close the file as to it.

3. Approve the appropriate letter to Longevity International Enterprises Corporation.

Lawrence M. Noble  
General Counsel

12/21/99  
Date

  
Lois G. Lerner  
Associate General Counsel

Staff Assigned: Xavier McDonnell

Attachments:

1. Proposed Agreement with Longevity
2. Correspondence with Longevity

21-04-402-5167